

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : CR. NO. 1:24-CR- 189

v. :

RICHARD LITTLE, : (Judge MANNION)
Defendant. :

INDICTMENT

THE GRAND JURY CHARGES:

FILED
HARRISBURG, PA

JUL 24 2024

COUNT 1
18 U.S.C. § 2261A
(Cyberstalking)

PER ISR
DEPUTY CLERK

INTRODUCTION

At times material to this Indictment:

1. Victim 1 formerly worked with Defendant, Richard Little.
2. Victim 2 was a Pennsylvania State Senator.
3. Victim 3 was a Franklin County Commissioner.
4. On or about June 10, 2024, Little posted to his social-media account on the Facebook platform:
 - a. A photograph of the firing pin of a firearm with the caption: "*Nobody around here wants to enforce federal law? Kill switch engaged. Come evict me. I'm ready.*"

- b. A photograph of a firearm, with the caption: *“The day I bought her so many years ago I knew, I knew there would come a day she and I would have our time together, Added a 3 ozs to her and she shoots like a 9mm now, no jump nothing, just 3 beautiful taps of 45 Acp, no sight adjustment, just straight laser fire, I love this weapon.”*
- c. A photograph of a firearm, with the caption: *“It’s time.....Mike Gregory, can ya get my 45-70 back to me in working order soon? If imma engage county tyrants, I wanna use a federal round, Irony, I love it (smiling emoji).”*

5. On or about June 10, 2024, at approximately 11:05 a.m., Little posted a video to his social-media account on the Facebook platform (“Video 1”) with the caption: *“I’m done [Victim 2]. You and your bullshit created this, don’t you fucking forget it. Come get me [Victim 1], you fucking pussy. Come get me.”*

6. In Video 1, a firearm and ammunition can be observed in Little’s residence along with a portion of a couch that is on its side, facing a door with a firearm on top of it.

7. In Video 1, Little stated, in part:

I just want you to know [Victim 1], this is the fucking war you wanted, you piece of shit, oh and this ain't half of it, I just started. As you can see, I've been waiting for this day for two years, you piece of shit . . . for two fucking years, I have been doing nothing but planning this fucking thing . . . I've got my kill zone . . . this is your fucking war. You created this. You might want to ask . . . about my little buddy (holding a firearm) . . . I've been waiting for this day for a while [Victim 1]. You've wanted this war mother fucker. Why don't you come evict me . . . I'm ready. I guaran-god-damn-tee you ain't, mother fucker.

8. On or about June 10, 2024, at approximately 11:11 a.m., Little posted a video to his social-media account on the Facebook platform (“Video 2”).

9. In Video 2, Little stated, in part:

Fifteen years you've been fucking with me, [Victim 1]. Trying to take what ain't yours . . . You and me, we got a God Damn date, [Victim 1] . . . You wanted it 15 years ago and look what the fuck you did with it. You been trying to kill me, bitch. But, I am still here. Why don't you bring your little pussy task force. 2824 Roosevelt Drive. You know where I am at, punk. . . . This is between you and me, [Victim 1]. You created this shit. You're going to bring your fucking bitch ass in here, and you're going to evict me personally. You fucking pussy. Fifteen years, and I am still here, mother fucker. And I'm about to get every God Damn inch of what I earned. Come get me, boy.

10. On or about June 10, 2024, at approximately 11:35 a.m., Little posted a video to his social-media account on the Facebook platform (“Video 3”).

11. In Video 3, ammunition and a firearm can be observed in Little’s residence as well as a portion of a couch that is on its side, facing a door with a firearm on top of it.

12. In Video 3, Little stated, in part:

For about the last 10 years, the federal government said fuck me, while these pieces of shit in this county have taken every right I’ve earned . . . Come to find out, [Victim 1] . . . see, I wanted to let bygones be bygones, but not that son of a bitch. See, I got to disappear because I know the truth about him killing them boys in Afghanistan. So . . . I’ve had two years to think about this and plan for it [Victim 1].

First, what we’ve got here (picking up a firearm) is a nice little 500, .50 caliber (aiming toward a door from behind the section of the couch on its side) . . . and after I unload that (showing a firearm and ammunition) . . . that bullet is going to rip through them and spray blood through the boys, shock and awe . . .

[And then,] I walk back here (moving into another room and picking up a firearm) . . . this AR-9 will be waiting . . . not fully automatic . . . that mother fucker shoots straight lasers at night . . . (showing ammunition) Now, I don't know if y'all remember, I built this big beautiful [firearm] (showing firearm) . . . the Donald Trump Thumper, a 450, . . . a 450 thumper. I like to call it 'The Trumper.' See, I got my nice kill zone right here (looking out a window) . . .

These little county tyrant mother fuckers have made my life hell. Now they think they're going to evict me, because they refuse to give me any assistance . . . again, as you can see [Victim 1] (looking out a window), look at that beautiful kill zone . . . if that's how you want to play it, I'll kill your vehicles and then (picking up a firearm) look what I've got waiting . . . [Victim 1], if I am going down in a blaze of glory (picking up ammunition) . . . See [Victim 1], I'm nice enough to give you my plan, because I know you're a fucking idiot . . . Imagine what I am going to do now (picking up a firearm) . . . I have them special hollow points for law enforcement use only. Yeah, I figure that I got about . . . maybe 25 of them bullets . . .

I am going to tell you what [Victim 1], you and your boys better get ready because if you haven't figured out (turning camera to show his (Little's) face) them two years, I haven't done a damn thing other than get ready to protect my family . . .

You've got this fucktard [Victim 3] . . . I've had enough . . . I guess I'm just sick and tired of you not obeying federal law [Victim 1], seeing as how it cost me my first wife . . . But now you're trying to rip everything from me [Victim 1] and for the second time, and that ain't happening. So, as I said, ain't nobody in this county coming to evict me [Victim 1] . . . As you can see, I've been waiting for this motherfucking day buddy. Part 2 bitch. I guarantee I'll kill this squad of yours as well, but this time, we ain't training mother fucker. See you soon, bitch.

13. On or about June 10, 2024, at approximately 12:10 p.m., Little posted a video to his social-media account on the Facebook platform (“Video 4”).

14. In Video 4, Little stated, in part:

[Victim 3], you want to play drug dealer. I begged you. Why do you think I've been so fucking angry . . . Why do I gotta get so fucking angry for people to listen to me? You're going to wish you listened to me [Victim 3]. You want to play drug dealer? You're going to regret it.

[Victim 1], I just got done judging. I did not threaten. But I let [Victim 2] know. Oh, he realizes he should have never listened to you, [Victim 1] . . . You ought not to have messed with my family, [Victim 1]. You ought to have just let me get my SSDI and get out of here. But you wanted to play games. Well, as I said, videos, Senator, everything. They're either going to come get me or they're going to come get you . . .

After I passed [some] information along . . . the next evening, [Victim 3] posted some bullshit lie . . . How stupid are you [Victim 3]? Fuck, you're an idiot, man. I almost kind of enjoy you decided to play . . . but . . . you ain't going to be happy. [unintelligible] . . . has 20 different shades of fuck you. You are going to regret it, [Victim 3]. Trust me. Big fucking time. Like, oh my God. Like, oh yeah, you fucked up bad didn't you. You got the attention of the wrong fucking people, [Victim 3]. But, people make their choices [Victim 3], ain't that right . . . So, don't you fucking cry to me, boy. Don't you cry my mother fucking name . . . Sucks to be you. You, dumb fuck.

So, as I said, we're about to find out. I basically just . . . declared war on this county due to it not abiding by my federal rights . . . I pretty much got the county support except for that fucktard [Victim 3]. So, I guess, you are going to have to come get me, [Victim 1].

Oh, dear God, this is going to be fun. I'll be waiting, brother. You know, I'm waiting. If it's just you, ain't nothing in my hands but my fingers, brother. But if you bring your task force boys, I guess we are going to have to kill some more of them, but I am going to be doing the killing this time, mother fucker. So, it is going to hurt . . . Have a good life, [Victim 1], or what's left of it.

15. On or about June 21, 2024, Little posted a video to his social-media account on the Facebook platform ("Video 5").

16. In Video 5, Little stated, in part: “[Y]ou mother fuckers think there ain’t gonna be blood (he starts laughing) . . . I’m gonna God Damn pull everything off you mother fuckers (he starts laughing again) . . . and I’m gonna give it to baby girl as a present . . . You fucked up boy . . . you fucked up.”

STATUTORY ALLEGATION

17. Between on or about June 10, 2024, and June 21, 2024, in Franklin County, Pennsylvania, within the Middle District of Pennsylvania, the defendant,

RICHARD LITTLE,

with the intent to injure, harass, and intimidate another person, used an interactive computer service, an electronic communication service, an electronic communication system of interstate commerce, and other facilities of interstate and foreign commerce to engage in a course of conduct that attempted to cause and would be reasonably expected to cause substantial emotional distress to a person, namely, Victim 1.

All in violation of Title 18, United States Code, Sections 2261A(2)(B) and 2261(b)(5).

THE GRAND JURY FURTHER CHARGES:

COUNT 2
18 U.S.C. § 875
(Interstate Threat)

INTRODUCTION

18. Paragraphs 1–4 and 10–16 of Count 1 are incorporated here.

19. On or about April 4, 2024, Little stated, in part, to another person at the Franklin County Veteran Affairs Human Resource Building: “*get that mother fucking cock sucker [Victim 3] down here now so I can end him too.*”

STATUTORY ALLEGATION

20. On or about June 10, 2024, in Franklin County, Pennsylvania, within the Middle District of Pennsylvania, the defendant,

RICHARD LITTLE,

knowingly and willfully did transmit in interstate and foreign commerce a communication containing a threat to injure the person of another, to wit, Victim 3.

All in violation of Title 18, United States Code, Section 875(c).

THE GRAND JURY FURTHER CHARGES:

COUNT 3
18 U.S.C. § 875
(Interstate Threat)

INTRODUCTION

21. Paragraphs 1–2, 4–7, and 15–16 of Count 1 are incorporated here.

22. On or about June 21, 2024, before Little posted Video 5, Little posted the following on and to the Facebook social-media platform:
“[Victim 2] You ruin one more person I will wear your fucking flesh[.] You are done you piece of shit, leave now or don’t[.] But you will leave today. Or you will not be found Monday [Victim 2]. Make your fucking choice[.]”

STATUTORY ALLEGATION

23. On or about June 21, 2024, in Franklin County, Pennsylvania, within the Middle District of Pennsylvania, the defendant,

RICHARD LITTLE,

knowingly and willfully did transmit in interstate and foreign commerce a communication containing a threat to injure the person of another, to wit, Victim 2.

All in violation of Title 18, United States Code, Section 875(c).

THE GRAND JURY FURTHER CHARGES:

COUNT 4

18 U.S.C. § 922(g)(3)

(Possession of Firearm by Prohibited Person)

24. Between on or about May 10, 2024, and June 21, 2024, in Franklin County, Pennsylvania, within the Middle District of Pennsylvania, the defendant,

RICHARD LITTLE,

knowing that he was an unlawful user of a controlled substance as defined in 21 U.S.C. § 802, did knowingly possess a firearm, that is, a Taurus revolver (Serial No. LZ31174), a Diamondback 9mm pistol (Serial No. YL4112), a Ruger .22 caliber rifle (Serial No. 0017-49554), a Walther PP pistol (Serial No. 411869), an Anderson AM-15 multi-caliber pistol (Serial No. 19108753), a Tennessee Arms TAC-9 pistol (Serial No. G000003507), a Ruger .22 pistol (Serial No. 493-17034), a Walther PKK/S .380 caliber pistol (Serial No. 0642BAV), a Smith & Wesson Model 500 revolver (Serial No. DMZ8656), a Taurus Raging Hunter revolver (Serial No. MT592798), a Desert Eagle 1911G .45 caliber

pistol (Serial No. G000037), a Mossburg 590 Shockwave (Serial No. V1078074), a Henry Model: H015-12 12-gauge shotgun (Serial No. 12TSSS00143), a Remington Arms 12-gauge shotgun (Serial No. 93734), an Anderson AM-15 multi-caliber rifle (Serial No. 20040558), a Henry Arms Model: H006C .45 caliber rifle (Serial No. BB0074956C), and a Bushmaster XM15-E25 (Serial No. L2031573), said firearms having been shipped and transported in interstate and foreign commerce.

All in violation of Title 18, United States Code, Sections 922(g)(3) and 924(a)(8).

FORFEITURE ALLEGATION

25. The allegations contained in Count 4 of this Indictment are incorporated here for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Sections 981(a)(1)(c) and 924(d), and Title 28, United States Code, Section 2461.

26. Upon conviction of the offense in violation of Title 18, United States Code, Section 922 as set forth in Count 4 of the Indictment, the defendant,

RICHARD LITTLE,

shall forfeit to the United States pursuant to Title 18, United States Code, Sections 981(a)(1)(c) and 924(d), and Title 28, United States Code, Section 2461, any firearms and ammunition involved in the commission of the offenses, including, but not limited to:

- a. Taurus revolver (Serial No. LZ31174);
- b. a Diamondback 9mm pistol (Serial No. YL4112);
- c. a Ruger .22 caliber rifle (Serial No. 0017-49554);
- d. a Walther PP pistol (Serial No. 411869);
- e. an Anderson AM-15 multi-caliber pistol (Serial No. 19108753);
- f. a Tennessee Arms TAC-9 pistol (Serial No. G000003507);
- g. a Ruger .22 pistol (Serial No. 493-17034);
- h. a Walther PKK/S .380 caliber pistol (Serial No.0642BAV);
- i. a Smith & Wesson Model 500 revolver (Serial No. DMZ8656);
- j. a Taurus Raging Hunter revolver (Serial No. MT592798);
- k. a Desert Eagle1911G .45 caliber pistol (Serial No. G0000037);

- l. a Mossburg 590 Shockwave (Serial No. V1078074);
- m. a Henry Model: H015-12 12-gauge shotgun (Serial No. 12TSSS00143);
- n. a Remington Arms 12-gauge shotgun (Serial No. 93734);
- o. an Anderson AM-15 multi-caliber rifle (Serial No. 20040558);
- p. a Henry Arms Model: H006C .45 caliber rifle (Serial No. BB0074956C);
- q. a Bushmaster XM15-E25 (Serial No. L2031573); and,
- r. any/all associated ammunition.

27. If any of the property described above, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or,
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

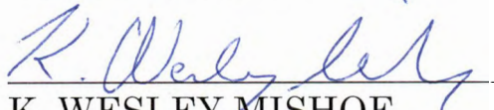
All pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c).

A TRUE BILL:



FOREPERSON

GERARD M. KARAM
United States Attorney



K. WESLEY MISHOE
Assistant United States Attorney

7/24/2024
Date